UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JERROLD DOLINS, on behalf of himself, and all others similarly situated,

CASE NO. 1:16-cv-08898

Plaintiff,

Honorable Gary Feinerman

v.

CONTINENTAL CASUALTY COMPANY; CONTINENTAL ASSURANCE COMPANY; CNA FINANCIAL CORPORATION; INVESTMENT COMMITTEE OF THE CNA 401(k) PLUS PLAN; NORTHERN TRUST COMPANY; AND DOES 1 through 10,

Defendants.

PLAINTIFF'S UNOPPOSED MOTION FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES, AND FOR INCENTIVE AWARD TO NAMED PLAINTIFF

Plaintiff Jerrold Dolins ("Named Plaintiff"), by and through his attorneys, respectfully move the Court for an Order: (1) approving awards of attorneys' fees and expenses to his attorneys Keller Rohrback L.L.P. and Levun Goodman & Cohen, LLP ("Class Counsel") and for settlement administration; and (2) granting an incentive awards to himself, as class representative. Defendants do not oppose the relief sought herein. For the reasons set forth in the accompanying Memorandum, and based on the accompanying Joint Declaration of Jeffrey Lewis and Lawrence S. Goodman in Support of (1) Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement and Certification of Settlement Class; and (2) Plaintiff's Unopposed Motion for Award of Attorneys' Fees and Reimbursement of Expenses, and for Incentive Award to Named Plaintiff; Declaration of Eric Kierkegaard Regarding Notice and Settlement Administration; Declaration of Jerrold Dolins; and all of the files and records in this action,

¹ Plaintiffs file the instant Motion contemporaneously with their Unopposed Motion for Final Approval of Settlement Agreement and Certification of Settlement Class.

Plaintiff asks that the Court grant this motion and approve the award out of the proceeds of (1) attorneys' fees in the amount of \$5 million less expenses and Incentive Award, (2) attorneys' fees and expenses to Plaintiff's Counsel and the Settlement Administrator, and (3) an Incentive Award of \$10,000.00 to Named Plaintiff.

DATED this 6th day of August, 2018.

KELLER ROHRBACK L.L.P.

By: <u>/s/ Jeffrey Lewis</u> Jeffrey Lewis

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CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2018, I electronically filed the above with the Clerk of the Court using the CM/ECF system, which in turn sent notice to all counsel of record.

Dated: August 6, 2018	/s/ Jeffrey Lewis
	Jeffrey Lewis